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November 22, 2021

VIA ECF

United States District Court
Southern District of New York

Attn: Hon. Lorna G. Schofield, U.S.D.J.
40 Foley Square, Courtroom 1106
New York, NY 10007-1312

The parties shall complete each deposition by the individual dates listed below. For the two unscheduled depositions, the parties are reminded that fact discovery closes on November 30, 2021, and no further discovery extensions will be granted. So Ordered.

Dated: November 23, 2021

New York, New York

Re: Edelman v. NYU Langone Health System, et al.
Case No.: 1:21-cv-502 (LGS) (GWG)
MLLG File No.: 209-2020


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

This firm represents the Plaintiff Dr. Sari Edelman (hereinafter “Plaintiff” or “Dr. Edelman”) in the above-referenced case. The parties write jointly pursuant to the Court’s Order (ECF Docket Entry 68) requesting that the parties file a letter proposing a date for the deposition of Dr. Andrew Porges (hereinafter “Dr Porges”). The parties have confirmed the deposition of Dr. Porges for December 10, 2021.

The parties respectfully submit the following remaining deposition schedule in addition to that of Dr. Porges:

November 22, 2021	Dr. Kavini Mehta, which is currently underway
November 29, 2021	Miriam Ruiz
To be determined	Dr. Avram Goldberg (hereinafter “Dr. Goldberg”) ¹
To be determined	Dr. Joseph Taverni

Plaintiff respectfully submits that the deposition of Dr. Goldberg is necessary based on conflicting testimony provided by witnesses and Defendants previously deposed. Further, Plaintiff has had trouble serving Dr. Joseph Taverni with a subpoena but expects that service will be completed before the end of next week.

The parties thank this honorable Court for its time and attention to this case, and look forward to completing discovery expeditiously.

¹ Dr. Goldberg is to be deposed at Plaintiff’s request. Defendants must confirm Dr. Goldberg’s availability between now and the close of discovery. The parties will work together to secure a mutually agreeable date for same.

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Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

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